

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

MOMODOU TAAL, MŨKOMA WA NGŨGĨ, and
SRIRAM PARASURAMA,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; U.S.
DEPARTMENT OF HOMELAND SECURITY;
and KRISTI NOEM, in her official capacity as
Secretary of the U.S. Department of Homeland
Security;

Defendants.

NOTICE OF MOTION

Civil Action No. 3:25-CV-00335-ECC

PLEASE TAKE NOTICE that, upon the Complaint and the exhibits attached thereto, the accompanying memorandum of law, and all other pleadings and proceedings in this action, Plaintiffs, by and through undersigned counsel, submit this *ex parte* application for emergency relief to enjoin Defendants Donald Trump, the Department of Homeland Security (“DHS”) and DHS Secretary Kristi Noem from attempting to detain, remove or otherwise enforce the two executive orders against Mr. Taal, and grant any other relief that the Court deems just and proper.

Dated: March 19, 2025

Respectfully submitted,

s/ Eric Lee

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**pro hac vice* application filed